




Spring of 2019, and continuing thereafter, up to and including the date of this Second Superseding Indictment, in the District of South Carolina and elsewhere, the Defendants,  **GENO CURTIS WHITE, JR., EBONY WILLIAMS, MAURICE ADAMS, a/k/a "Black," EMILY MOORE, XAVIER WILLIAMS, a/k/a "P," a/k/a "Pretty," BRIANNA WHITE, MARCUS NOTTAGE, a/k/a "Studda," MAURICE MITCHELL, a/k/a "Frapp," JESUS WILSON-LOMBIDA, BRIAN ROQUE, JORGE ESTRADA, ALIF WILLIAMS, ISAIAH SPANN, and TEVON GATHERS, a/k/a "T-Bone,"** knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and with others, both known and unknown to the Grand Jury, to possess with intent to distribute and to distribute N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as "fentanyl"), methamphetamine, and cocaine, all Schedule II controlled substances, and heroin, a Schedule I controlled substance,

a. 

- b. With respect to **GENO CURTIS WHITE, JR.**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 5 kilograms or more of cocaine, and 1 kilogram or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- c. With respect to **EBONY WILLIAMS**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 500 grams or more of cocaine, and 1 kilogram or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B);
- d. With respect to **MAURICE ADAMS, a/k/a “Black,”** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

- e. With respect to **EMILY MOORE**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- f. With respect to **XAVIER WILLIAMS, a/k/a “P,” a/k/a “Pretty,”** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), and 1 kilogram or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- g. With respect to **BRIANNA WHITE**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- h. With respect to **MARCUS NOTTAGE, a/k/a “Studda,”** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1) and

841(b)(1)(A);

- i. With respect to **MAURICE MITCHELL, a/k/a “Frapp,”** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), and a quantity of cocaine, heroin, and methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);
- j. With respect to **JESUS WILSON-LOMBIDA,** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- k. With respect to **BRIAN ROQUE,** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), and 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- l. With respect to **JORGE ESTRADA,** the amount involved in the conspiracy

- attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B);
- m. With respect to **ALIF WILLIAMS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of heroin and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);
- n. With respect to **ISAIAH SPANN**, the amount involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, is a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and
- o. With respect to **TEVON GATHERS, a/k/a “T-Bone,”** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), and 1 kilogram or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

All in violation of Title 21, United States Code, Section 846.

**COUNT 2**

THE GRAND JURY FURTHER CHARGES:

That on or about January 8, 2020, in the District of South Carolina, the Defendant, **ALIF WILLIAMS**, knowingly, intentionally, and unlawfully did possess with intent to distribute and did distribute a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly known as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);

**COUNT 3**

THE GRAND JURY FURTHER CHARGES:

That on or about May 29, 2020, in the District of South Carolina, the Defendant, **XAVIER WILLIAMS, a/k/a “P,” a/k/a “Pretty,”** knowingly, intentionally, and unlawfully did possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly known as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 4**

THE GRAND JURY FURTHER CHARGES:

That on or about August 11, 2020, in the District of South Carolina, the Defendant, **EMILY MOORE**, knowingly, intentionally, and unlawfully did possess with intent to

distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 5**

THE GRAND JURY FURTHER CHARGES:

That on or about November 14, 2020, in the District of South Carolina, the Defendant, **EBONY WILLIAMS**, knowingly, intentionally, and unlawfully did possess with intent to distribute 500 grams or more of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT 6**

THE GRAND JURY FURTHER CHARGES:

That on or about November 14, 2020, in the District of South Carolina, the Defendant, **GENO CURTIS WHITE, JR.**, knowingly, intentionally, and unlawfully did possess with intent to distribute 500 grams or more of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).



**COUNT 7**

THE GRAND JURY FURTHER CHARGES:

That on or about November 14, 2020, in the District of South Carolina, the Defendant, **GENO CURTIS WHITE, JR.**, knowingly did possess ammunition in and affecting commerce, that is, 9mm ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

**COUNT 8**

THE GRAND JURY FURTHER CHARGES:

That on or about November 17, 2020, in the District of South Carolina, the Defendant, **BRIANNA WHITE**, knowingly, intentionally, and unlawfully did attempt to possess with intent to distribute 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

**COUNT 9**

THE GRAND JURY FURTHER CHARGES:

That on or about November 17, 2020, in the District of South Carolina, the Defendant, **BRIANNA WHITE**, knowingly did possess a firearm in furtherance of a drug trafficking crime, as set forth in Count 8, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT 10**

THE GRAND JURY FURTHER CHARGES:

That on or about November 17, 2020, in the District of South Carolina, the Defendant, **MARCUS NOTTAGE, a/k/a “Studda,”** knowingly, intentionally, and unlawfully did attempt to distribute 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

**COUNT 11**

THE GRAND JURY FURTHER CHARGES:

That on or about November 17, 2020, in the District of South Carolina, the Defendant, **MAURICE MITCHELL, a/k/a “Frapp,”** knowingly, intentionally, and

unlawfully did attempt to possess with intent to distribute 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

**COUNT 12**

THE GRAND JURY FURTHER CHARGES:

That on or about June 1, 2021, in the District of South Carolina, the Defendant, **JESUS WILSON-LOMBIDA**, knowingly, intentionally, and unlawfully did possess with intent to distribute 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 13**

THE GRAND JURY FURTHER CHARGES:

That on or about September 21, 2021, in the District of South Carolina, the Defendant, **ISAIAH SPANN**, knowingly, intentionally, and unlawfully did possess with intent to distribute, a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly known as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 14**

THE GRAND JURY FURTHER CHARGES:

That on or about September 24, 2021, in the District of South Carolina, the Defendant, **MAURICE MITCHELL, a/k/a “Frapp,”** knowingly, intentionally, and unlawfully did possess with intent to distribute a quantity of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly known as “fentanyl”) and methamphetamine, both Schedule II controlled substance, and heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 15**

THE GRAND JURY FURTHER CHARGES:

That on or about September 24, 2021, in the District of South Carolina, the Defendant, **MAURICE MITCHELL, a/k/a “Frapp,”** knowingly did possess firearms, in and affecting commerce, that is, a Smith & Wesson, model M&P Shield, 9mm handgun; a Taurus, model Protector Poly, .357 caliber revolver; and a Taurus, model G2c, 9mm handgun, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

**COUNT 16**

THE GRAND JURY FURTHER CHARGES:

That on or about September 24, 2021, in the District of South Carolina, the Defendant, **MAURICE MITCHELL, a/k/a “Frapp,”** knowingly did possess firearms in furtherance of a drug trafficking crime, as set forth in Count 14, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT 17**

THE GRAND JURY FURTHER CHARGES:

That on or about October 18, 2021, in the District of South Carolina, the Defendant, **TEVON GATHERS, a/k/a “T-Bone,”** knowingly, intentionally, and unlawfully did possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (commonly known as “fentanyl”), a Schedule II controlled substance, and 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**FORFEITURE ALLEGATION**

**FIREARM/DRUG TRAFFICKING OFFENSES:**

Upon conviction for felony violation of Title 18 and 21, United States Code as charged in this Second Superseding Indictment, the Defendants, [REDACTED]

[REDACTED] **GENO CURTIS WHITE, JR., EBONY WILLIAMS, MAURICE ADAMS, a/k/a "Black," EMILY MOORE, XAVIER WILLIAMS, a/k/a "P," a/k/a "Pretty," BRIANNA WHITE, MARCUS NOTTAGE, a/k/a "Studda," MAURICE MITCHELL, a/k/a "Frapp," JESUS WILSON-LOMBIDA, JORGE ESTRADA, BRIAN ROQUE, ALIF WILLIAMS, ISIAAH SPANN, and TEVON GATHERS, a/k/a "T-Bone,"** shall forfeit to the United States all of the Defendants' rights, title, and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
  - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
  - (2) involved in or used in any knowing violation of 18 U.S.C. §§ 922 or 924, or violation of any other criminal law of the United States or intended to be used in a crime of violence.

PROPERTY:

Pursuant to Title 18, United States Code, 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Second Superseding Indictment includes, but is not limited to, the following:

A. Firearms:

1. Smith & Wesson M&P Shield 9mm caliber handgun with magazine  
(Serial Number: LEC7908)  
Asset ID: 21-DEA-683898
2. Taurus .357 Protector Poly revolver  
(Serial Number: L060069)  
Asset ID: 21-DEA-683896
3. Taurus PT 111 9mm with magazine  
(Serial Number: TLM93321)  
Asset ID: 21-DEA-683897

B. Proceeds/Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug offenses charged in the Second Superseding Indictment, and all interest and proceeds traceable thereto as a result for their violation of Title 21 United States Code.

C. Cash/United States Currency:

1. \$46,210.00 in United States currency seized from **BRIANNA WHITE**  
Asset ID: 21-DEA-679348
2. \$97,845.00 in United States currency seized from **MARCUS NOTTAGE, a/k/a "Studda," and MAURICE MITCHELL, a/k/a "Frapp"**  
Asset ID: 21-DEA-679346



3. \$60,922.00 in United States currency seized from **MAURICE MITHCELL**  
Asset ID: 21-DEA-683900 \

D. Jewelry:

- (11) Assorted Jewelry and Precious Items seized from **MAURICE MITHCELL**  
Asset ID: 21-DEA-684872

E. Vehicles:

1. 2020 Honda SXS700M2 Utility ATV seized from **MAURICE MITHCELL**  
Asset ID: 21-DEA-683920
2. 2017 Ford F-350 Pick-up seized from **MAURICE MITHCELL**  
Asset ID: 21-DEA-683915

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the Defendants up to an amount equivalent to the value of the above-described forfeitable property;

Pursuant to Title 18, United States Code, 924(d)(1), Title 21, United States Code,



Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

**SENTENCING ENHANCEMENT PROVISIONS**

THE GRAND JURY FURTHER CHARGES:

The Defendants, 

**GENO CURTIS WHITE, JR., JESUS WILSON-LOMBIDA, XAVIER WILLIAMS, a/k/a “P,” a/k/a “Pretty,” MAURICE MITHCELL, a/k/a “Frapp,” and TEVON GATHERS, a/k/a “T-Bone,”** prior to committing the violation(s) contained in this Second Superseding Indictment, had the following conviction(s) for serious drug felon(ies) and serious violent felon(ies), pursuant to Title 21, United States Code, Sections 802(57) and 802(58), that had become final for the purposes of Title 21, United States Code, Section 841:

1. 

2. **GENO CURTIS WHITE, JR.**

- a. October 31, 2014 – a conviction for a serious drug felony in the District South Carolina, CMECF 2:13-cr-00919, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Count 1 and 6 of this Second Superseding Indictment.

**3. JESUS WILSON-LOMBIDA**

- a. September 21, 2010 – a conviction for a serious drug felony in the State of Minnesota, 24CR082997, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Count 1 and 12 of this Second Superseding Indictment.

**4. XAVIER WILLIAMS**

- a. September 20, 2012 – a conviction for a serious drug felony in the State of South Carolina, 2012GS1003538, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Counts 1 and 3 of this Second Superseding Indictment.

**5. MAURICE MITCHELL**

- a. December 5, 2007 – a conviction for a serious drug felony in the State of South Carolina, 2007GS1005834, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Counts 1, 11, and 14 of this Second Superseding Indictment.

**6. TEVON GATHERS**

- a. December 5, 2006 – a conviction for a serious drug felony in the State of South Carolina, 06GS109190, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Counts 1 and 17 of this Second Superseding Indictment.
- b. December 5, 2006 – a conviction for a serious drug felony in the State of South Carolina, 06GS109191, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Counts 1 and 17 of this Second Superseding Indictment.
- c. December 5, 2006 – a conviction for a serious drug felony in the State of South Carolina, 06GS109192, for which the Defendant served more than

12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Counts 1 and 17 of this Second Superseding Indictment.

- d. January 13, 2010 – a conviction for a serious drug felony in the State of South Carolina, 09GS1009100, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Counts 1 and 17 of this Second Superseding Indictment

All in violation of Title 21, United States Code, Sections 802, 841, and 851.

A True BILL

  
FOREPERSON

  
M. RHETT DEHART (jls)  
ACTING UNITED STATES ATTORNEY